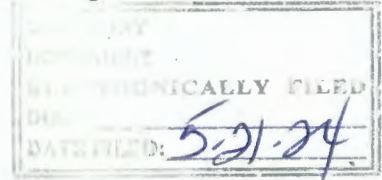




USHER LAW GROUP P.C.

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May 17, 2024

Hon. Lewis A. Kaplan
U.S. District Court
Southern District District of New York
500 Pearl St.
New York, NY 10007-1312

**RE: United States v. Joy Harris, 1:24-cr-00207-LAK
Request for Extension of Time to File Motions**

Your Honor,

Undersigned counsel represents the Defendant Joy Harris in the above-captioned matter. Currently Defendant's motions are due by June, 7, 2024; Government opposition is due by June 21, 2024; Defendant's Reply would be due by June 28, 2024 and; Oral Argument or a PTC would then be held on July 10, 2024. Defendant respectfully requests a thirty day extension to submit any Motions as necessary. The dates for Opposition, Reply and Oral Argument would then also be shifted 30 days. Assistant United States Attorney Meredith Foster, Esq. has consented to this request.

If the motion schedule is pushed back thirty days, it will still be resolved by early August, well in advance of trial in September. Defendant makes this request in the interests of justice due to the large volume of files produced by the United States. Over two thousand files were provided and there were difficulties with opening them.

Thank you for your attention in this matter. Should you have any questions, please do not hesitate to contact our office at any time.

SO ORDERED

5/21/24